

Judge: Hon. Christopher M. Alston  
Chapter: 7

UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

**IN RE:**

Case No. 22-11595-CMA

STANLEY J. CAREY,  
MARY K. CAREY,

## Debtors.

**EX PARTE APPLICATION FOR 2004 ORDER  
AUTHORIZING THE TRUSTEE TO COMPEL  
PRODUCTION OF DOCUMENTS AND  
DECLARATION IN SUPPORT THEREOF**

Edmund J. Wood, the Chapter 7 Trustee of the above-referenced bankruptcy estate ("Trustee") moves this court for an *ex parte* order compelling production of documents by Wells Fargo Clearing Services, LLC, of all documents in its possession or control relating to financial accounts it maintained with the Debtors and or entities in which they have or had an interest.

Dated this 18<sup>th</sup> day of September, 2023.

Wood & Jones, P.S.

/s/ Denice E. Moewes  
Denice E. Moewes, WSBA #19464  
Attorney for Edmund J. Wood  
Chapter 7 Trustee

**DECLARATION OF DENICE E. MOEWES**

I, DENICE E. MOEWES, declare and state as follows:

1. I am the Attorney for the Trustee in this case. I make this declaration from my personal knowledge, and I am competent to testify.

2004 MOTION

**Wood & Jones, P.S.**  
303 N. 67<sup>th</sup> Street  
Seattle WA 98103  
(206) 623-4382

1           2. The Trustee is investigating the financial transactions, assets and  
2 liabilities of the Debtors. Either the Debtors or entities in which they have or had an  
3 interest maintained financial accounts with Wells Fargo Advisors, Wells Fargo  
4 Clearing Services, LLC. The Trustee is seeking a 2004 order which authorizes the  
5 Trustee to compel the production of those records by the date set forth in a subpoena  
6 to be issued by me.

8           I certify under penalty of perjury under the laws of the State of Washington  
9 that the foregoing is true and correct to the best of my knowledge.  
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11           Signed and dated this 18<sup>th</sup> day of September, 2023 at Seattle, Washington.  
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13           /s/Denice E. Moewes  
14           Denice E. Moewes, WSBA #19464  
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2004 MOTION

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